

REMARKS

This is a full and timely response to the outstanding final Office Action mailed April 4, 2005. Reconsideration and allowance of the application and pending claims are respectfully requested.

I. Claim Rejections - 35 U.S.C. § 102(e)

Claims 22-26, 29-37, 42, 43, and 45-47 have been rejected under 35 U.S.C. § 102(e) as being anticipated by Goshey, et al. ("Goshey," U.S. Pat. No. 6,327,613). Applicant respectfully traverses this rejection.

It is axiomatic that "[a]nticipation requires the disclosure in a single prior art reference of each element of the claim under consideration." *W. L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 1554, 220 USPQ 303, 313 (Fed. Cir. 1983). Therefore, every claimed feature of the claimed invention must be represented in the applied reference to constitute a proper rejection under 35 U.S.C. § 102(e).

In the present case, not every feature of the claimed invention is represented in the Goshey reference. Applicant discusses the Goshey reference and Applicant's claims in the following.

A. The Goshey Disclosure

Goshey discloses a method and apparatus for sharing peripheral devices over a network. Goshey, Patent Title. As is described by Goshey, a system is envisioned in which a plurality of computers (e.g., 112a, 112b, and 112d) connected to a network 110 comprise external peripheral devices that are directly connected thereto. Goshey, column 4, lines 31-36. Each of the computers 112 is provided with software code that enables other computers connected to the network to use the peripheral devices that are

connected to the computers. Goshey, column 4, line 67 to column 5, line 5. In this manner, a first computer (e.g., 112d) may access and use a peripheral device directly connected to a second computer (e.g., 112b).

A specific example of the above functionality is provided in column 5. As is described by Goshey:

By way of example, if the Server (S) ScanLAN code is loaded onto computer 112b, and the Client (C) ScanLAN code is loaded onto computer 112d, then the user of computer 112d may be granted access privileges to the peripheral devices connected to computer 112b (which runs as a Server). Alternatively, each one of computers 112b and 112d may be loaded with both the Server and the Client ScanLAN code, which will therefore enable other users connected to the network to access the peripheral devices connected to both computer 112b and computer 112d, when they are running as a Server.

[Goshey, column 5, lines 25-35]

From the above, it is clear that Goshey provides a system in which remote peripheral devices may be accessed and used *if* they are directly connected to a computer that comprises Goshey's "ScanLan" code.

B. Applicant's Claims

As is noted above, Goshey teaches that peripheral devices may be accessed and used if they are directly connected to a computer that comprises specific code that is adapted to facilitate peripheral device sharing. As is discussed in the following, however, Applicant's claims describe methods, services, and systems that enable use of remote peripheral devices that are *not* directly connected to a computer that comprises such code. Applicant discusses Applicant's claims in the following.

1. **Claims 22-31**

Applicant's independent claim 22 provides as follows (emphasis added):

22. A method, comprising:

discovering printing devices on a network *that are not directly connected to a computer*; and

providing to a user via a network browser a list of at least one device that is available for use on the network, wherein the list comprises at least one link to an available device.

Applicant notes that, as is described above, Goshey's system is described, and only described, as facilitating access to peripheral devices that are directly connected to a computer that comprises "ScanLan" code that enables peripheral device sharing. Accordingly, Goshey does not teach a method comprising "discovering printing devices on a network that are not directly connected to a computer" as is now recited in claim 1. Applicant notes that ample support exists for this limitation in Applicant's original disclosure. For example, Applicant describes a system environment in relation to Figure 3 in which a first printer (320) and a second printer (330) are directly accessed by other devices (such as a client computer 310) via a network (LAN, 340). The figure shows no computers directly connected to the printers, and the first printer (320) is further described as a "web enabled" printer that includes its own server (326) that can be directly accessed via the network (340).

At least in view of the above, Applicant respectfully submits that Goshey does not anticipate claim 22, or the claims that depend therefrom. Applicant

therefore respectfully requests that the rejections against these claims be withdrawn.

2. Claims 32-38

Applicant's independent claim 32 provides as follows (emphasis added):

32. A device discovery service stored on a computer-readable medium, the service comprising:

logic configured to discover printing devices on a network that are not directly connected to a computer; and

logic configured to provide a user home service accessible with a network browser with a list of at least one device that is available for use on the network.

Regarding claim 32, Goshey at least does not teach "logic configured to discover printing devices on a network that are not directly connected to a computer" for reasons discussed in relation to claim 22. Applicant respectfully submits that Goshey therefore does not anticipate claim 32 and its dependents, and respectfully requests that the rejections against these claims be withdrawn.

3. Claims 39-41

Applicant's independent claim 39 provides as follows (emphasis added):

39. A web-based imaging home service stored on a computer-readable medium, the service comprising:

logic configured to query a network to detect a device discovery service;

logic configured to receive a set of universal resource locators (URLs) *that identify the locations of printing devices* discovered by the device discovery service, *the printing devices not directly connected to a computer*;

logic configured to create links to the discovered devices; and

logic configured to provide the links to a user in the network browser.

Regarding claim 39, Goshey at least does not teach “logic configured to receive a set of universal resource locators (URLs) that identify the locations of printing devices discovered by the device discovery service, the printing devices not directly connected to a computer” for reasons discussed in relation to claim 22. Applicant respectfully submits that Goshey therefore does not anticipate claim 39 and its dependents, and respectfully requests that the rejections against these claims be withdrawn.

4. Claims 42-47

Applicant’s independent claim 42 provides as follows (emphasis added):

42. A system, comprising:

means for discovering printing devices on a network that are not directly connected to a computer;

means for querying the means for discovering to receive a list of discovered devices;

means for creating links to the discovered devices; and

means for providing the links to a user in a network browser for selection.

Regarding claim 42, Goshey does not teach “means for discovering printing devices on a network that are not directly connected to a computer” for reasons discussed in relation to claim 22. Applicant respectfully submits that Goshey therefore does not anticipate claim 42 and its dependents, and respectfully requests that the rejections against these claims be withdrawn.

5. Conclusion

Due to the shortcomings of the Goshey reference described in the foregoing, Applicant respectfully asserts that Goshey does not anticipate Applicant’s claims. Therefore, Applicant respectfully requests that the rejection of these claims be withdrawn.

II. Claim Rejections - 35 U.S.C. § 103(a)

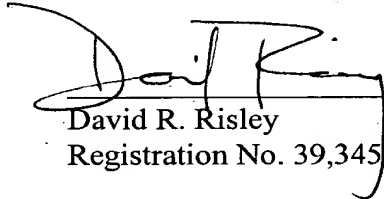
Claims 27-28, 38-41, and 44 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Goshey in view of Carcerano, et al. (“Carcerano,” U.S. Pat. No. 6,308,205). Applicant respectfully traverses this rejection.

As is identified above, Goshey does not teach explicit limitations of Applicant’s claims. In that Carcerano does not remedy the deficiencies of the Goshey reference, Applicant respectfully submits that claims 27-28, 38-41, and 44 are allowable over the Goshey/Carcerano combination for at least the same reasons that Applicant’s other claims are allowable over Goshey.

CONCLUSION

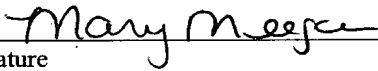
Applicant respectfully submits that Applicant's pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,


David R. Risley
Registration No. 39,345

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail, postage prepaid, in an envelope addressed to: Assistant Commissioner for Patents, Alexandria, Virginia 22313-1450, on

6-30-05



Signature